

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

**WILLIAM DEREK RUSSELL,
Deceased, by next of kin, Z.R., a minor,
By next friends, CINDY FAWVER and
FRANK RUSSELL,**

Plaintiffs,

**Case No.: 2:22-CV-86
JURY DEMAND**

v.

PHOENIX REDEVELOPMENT BRISTOL, LLC,

Defendant.

**DEFENDANT'S NOTICE OF INTENT TO SERVE SUBPOENA ON WILLIAM L.
JENKINS FORENSIC CENTER TO PRODUCE DOCUMENTS, INFORMATION, OR
OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

COMES NOW the Defendant, Phoenix Redevelopment Bristol, LLC (hereinafter "Phoenix" or "Defendant"), by and through counsel, and hereby provides notice that on March 31, 2023, it intends to serve a true and correct copy of the attached subpoena (Exhibit A) to produce documents, information, or objects or to permit inspection of premises in a civil action on William L. Jenkins Forensic Center. This subpoena is served for the purpose of obtaining any and all records related to the autopsy report for Plaintiff, William Derek Russell believed to be maintained by this entity.

/s/ Andrew N. Firkins
Clint J. Woodfin (BPR# 016346)
Andrew N. Firkins (BPR# 033982)
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CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2023, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

/s/ Andrew N. Firkins
Andrew N. Firkins (BPR# 033982)